

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS PALUMBO, NATASHA
PALUMBO, ECOMMERCE NATIONAL,
LLC d/b/a Tollfreedeals.com, and SIP
RETAIL d/b/a sipretail.com,

Defendants.

Civil Action No. 20-CV-473

(Komitee, J.)

(Mann, Ch. M.J.)

DECLARATION OF MARCY RALSTON

I, Marcy Ralston, have personal knowledge of the facts set forth below, and if called as a witness I would testify as follows:

1. I am a Special Agent with the Social Security Administration's Office of Inspector General ("SSA OIG"), Office of Investigations.

2. On January 27, 2020, I signed a declaration that was filed in the above-captioned matter in support of an application for a Temporary Restraining Order. That declaration inadvertently contained a miscounting of data.

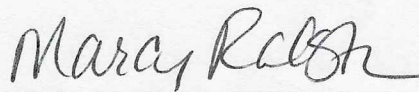
3. In paragraph 37 of my January 27, 2020 Declaration, I stated that from May 2019 through January 2020, TollFreeDeals received from USTelecom a total of 144 notifications that a fraudulent robocall had been traced back to TollFreeDeals. In paragraph 38 of my declaration I stated that from August 2019 through December 2019, USTelecom notified SIP Retail of 35 tracebacks of fraudulent robocalls.

4. On January 30, 2020, I reviewed the USTelecom data again and determined that between May 2019 and January 2020, TollFreeDeals received 66 traceback notifications that fraudulent robocalls had been traced back to TollFreeDeals. Of these notifications, 36 referenced SSA imposter fraud calls, ten referenced Tech Support imposter fraud calls, five referenced IRS imposter fraud calls, one referenced a USCIS impersonation fraud call, and 14 referenced other categories of fraudulent robocalls identified by USTelecom.

5. Based on my January 30, 2020 review of USTelecom data, between August 2019 and December 2019, USTelecom notified SIP Retail of 17 tracebacks of fraudulent robocalls. Of these notifications, 11 referenced SSA imposter fraud calls, three referenced Tech Support imposter fraud calls, one referenced a USCIS impersonation fraud call, and two referenced other categories of fraudulent robocalls identified by USTelecom.

6. In light of these corrected numbers, it is still correct that SSA OIG has identified TollFreeDeals as the number one gateway carrier of SSA imposter calls in 2019.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on February 3, 2020, in Noblesville, Indiana.



Marcy Ralston
Special Agent, SSA OIG